Before The POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 2000

Docket No. R2000-1

MOTION FOR LATE ACCEPTANCE OF RESPONSES OF THE UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO UPS AND OCA INTERROGATORIES (UPS/USPS-T13-10-14, OCA/USPS-T13-10-11)

The United States Postal Service hereby moves for acceptance one day late of the responses of witness Raymond to the following interrogatories: UPS/USPS-T13-10-14, filed on March 22, 2000, and OCA/USPS-T13-10-11, filed on March 23, 2000. The large number of interrogatories directed to this witness, together with the witness's necessary involvement in the conduct and attempted resolution of various procedural disputes regarding his interrogatory responses, did not permit the filing of responses until today.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Richard T. Cooper

475 L'Enfant Plaza West, S.W. (202) 268-2993; Fax: -5402 Washington, D.C. 20260-1137 April 24, 2000

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Richard T. Cooper

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1137 April 24, 2000